

**In the United States Court of Appeals
for the Ninth Circuit**

THE GEO GROUP, INC.,
Plaintiff-Appellee,

v.

JAY INSLEE, Governor;
ROBERT FERGUSON,
Defendants-Appellants.

No. 24-2815

**Plaintiff-Appellee's Motion for Extension of Time to File
Petition for Rehearing**

Pursuant to Federal Rule of Appellate Procedure 40(d)(1) and Ninth Circuit Rule 31-2.2(b), Plaintiff-Appellee The GEO Group, Inc. respectfully requests an extension of 14 days to petition for panel and/or en banc rehearing in the above-captioned matter. Undersigned counsel has conferred with counsel for Defendants-Appellants, who oppose this request.

GEO's petition is currently due September 2, 2025. With the extension, it will be due September 16, 2025.

This extension is necessary to assess the panel decision and its differences from precedent in other Circuits and to coordinate with the

United States, which participated at the panel stage, including oral argument, as amicus curiae in support of GEO. Additionally, over the coming month, undersigned counsel has an answering brief, a reply brief, and another petition for rehearing due in this Court alone.

This motion is being filed seven days before the current due date for GEO's petition. The extension will prejudice no party; even without rehearing, numerous issues remain on remand. GEO has exercised diligence in this important matter and will file its petition within the time requested. Finally, pursuant to Ninth Circuit Rule 31-2.2(b)(7), GEO also confirms that no court reporter is in default with regard to any designated transcripts.

Respectfully submitted

August 21, 2025

/s/ Dominic E. Draye

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CERTIFICATE OF SERVICE

Pursuant to Rule 25 of Federal Rules of Appellate Procedure, I hereby certify that on August 21, 2025, I caused to be electronically filed the foregoing with the Clerk of the United States Court of Appeals for the Ninth Circuit by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Dominic E. Draye
Dominic E. Draye